

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

TIFFANY ORLANDO,

Plaintiff,

v.

BOEING AEROSPACE OPERATIONS, INC.
and THE BOEING COMPANY,

Defendants.

Case No. 1:24-cv-2093-PTG-WBP

**CONSENT MOTION TO AMEND CASE SCHEDULE
AND DATE OF FINAL PRETRIAL CONFERENCE**

Pursuant to this Court's February 14, 2025 Order (Dkt. No. 30), Defendants Boeing Aerospace Operations, Inc. and The Boeing Company (together, "Boeing") and Plaintiff Tiffany Orlando ("Plaintiff"), by and through undersigned counsel, respectfully move this Court to enter an Order amending the case schedule and date of the pretrial conference. Specifically, the parties respectfully request the following amended deadlines:

Activity	Current Deadline	Proposed Deadline
Boeing's Motion for Summary Judgment		April 4, 2025 ¹
Plaintiff's Response Brief		April 18, 2025
Boeing's Reply Brief		April 24, 2025
Hearing (If Needed) on Boeing's Motion		May 1, 2025
Boeing's Expert Witness Disclosures	April 3, 2025	May 15, 2025

¹ Boeing will make every effort to file a dispositive motion by April 4, 2025. Some materials or attachments may be subject to NRO review before they may be filed.

Plaintiff's Rebuttal Expert Witness Disclosures	April 11, 2025	May 23, 2025
Fact Discovery Cutoff	April 11, 2025	May 23, 2025
Discovery Expert Deposition Deadline	April 18, 2025	May 30, 2025
Rule 26(a)(3) Pretrial Disclosures	April 16, 2025	June 4, 2025
Final Pretrial Conference	April 23, 2025	June 4, 2025

The grounds for this Consent Motion are fully set forth in the accompanying Memorandum in Support submitted with this Consent Motion. Additionally, a copy of the Proposed Order is attached to this Consent Motion as Exhibit A.

WHEREFORE, Boeing and Plaintiff respectfully request that this Court grant this Consent Motion and enter the parties' Proposed Order.

Dated: March 21, 2025

By: /s/ Ariel B. Glickman

Ariel B. Glickman, VSB #90751
 AGlickman@perkinscoie.com
 PERKINS COIE LLP
 700 Thirteenth Street, N.W., Suite 800
 Washington, D.C. 20005-3960
 Telephone: +1.202.654.6200
 Facsimile: +1.202.654.6211

Laura C. Hill (admitted *pro hac vice*)
 L.Hill@perkinscoie.com
 PERKINS COIE LLP
 1201 Third Avenue, Suite 4900
 Seattle, Washington 98101-3099
 Telephone: +1.206.359.8000
 Facsimile: +1.206.359.9000

Attorneys for Defendants Boeing Aerospace Operations, Inc. and The Boeing Company

SEEN AND AGREED:

By: /s/ *Justin M. Beall* (by ABG with
permission)

Justin M. Beall, VSB #46182
JBeall@koonz.com
KOONZ MCKENNEY JOHNSON &
DEPAOLIS LLP
Willow Wood Plaza I
10300 Eaton Place, Suite 200
Fairfax, Virginia 22030
Telephone: +1.703.218.4410
Facsimile: +1.703.218.4411

Attorney for Plaintiff Tiffany Orlando

CERTIFICATE OF SERVICE

I, Ariel B. Glickman, hereby certify that on March 21, 2025, I filed the foregoing
***CONSENT MOTION TO AMEND CASE SCHEDULE AND DATE OF FINAL PRETRIAL
CONFERENCE*** with the Clerk of the Court using the CM/ECF system, which will send
notification of such filing to the attorneys of record:

Justin M. Beall, VSB #46182
JBeall@koonz.com
KOONZ MCKENNEY JOHNSON &
DEPAOLIS LLP
Willow Wood Plaza I
10300 Eaton Place, Suite 200
Fairfax, Virginia 22030
Telephone: +1.703.218.4410
Facsimile: +1.703.218.4411

/s/ Ariel B. Glickman